

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Marc Jon Manchon, *
 *
Plaintiff *
v. * Case No. 1:24-cv-00347-LM-AJ
 *
Charlestown, NH Police Department, et al., *
 *
Defendants *
 *

MOTION FOR JUDGMENT ON THE PLEADINGS

Defendants Charlestown, NH Police Department, Patrick Connors, and Sirena Relihan (“Charlestown Defendants”), by their counsel, Gallagher, Callahan & Gartrell, P.C., submit this motion for judgment on the pleadings with respect to Plaintiff’s complaint arising out of his bail conditions and state as follows:

1. Plaintiff’s operative complaint includes claims against Charlestown Defendants under federal-law claims stemming from his bail conditions. (ECF Doc. 12.)
2. Based on the contemporaneously filed memorandum of law, Charlestown Defendants are entitled to judgment on the pleadings regarding Plaintiff’s complaint against them arising out of his bail conditions because (1) Plaintiff’s claims are barred by the Rooker-Feldman doctrine and (2) Plaintiff has not stated a cognizable claim upon which relief can be granted related to the bail conditions and the Charlestown Defendants. See Fed. R. Civ. P. 12(c); Local Rule 7.1(a)(2).
3. Due to the dispositive nature of this motion, concurrence was not sought. Local Rule 7.1(c).

WHEREFORE, Charlestown Defendants respectfully request that the Court:

- A. Grant this motion for judgment on the pleadings for the reasons set forth in the accompanying memorandum of law; and
- B. Grant such other relief that is just.

Respectfully submitted,

**CHARLESTOWN, NH POLICE DEPT.,
PATRICK CONNORS, AND
SIRENA RELIHAN**

By Their Attorneys,

Gallagher, Callahan & Gartrell, P.C.

Dated: May 16, 2025

By: /s/ Matthew V. Burrows
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent to all parties/counsel of record via the Court's Electronic Filing System.

Dated: May 16, 2025

By: /s/ Matthew V. Burrows
Matthew V. Burrows, Esq.